

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**TYRONE HENDERSON,  
JAMES O. HINES, JR.  
on behalf of themselves and others  
similarly situated,**

**Plaintiffs,**

**v.**

**Case 3:12-cv-00097-REP**

**CORELOGIC, INC., et al.**

**Defendants.**

**PLAINTIFFS' FOURTH SUPPLEMENTAL FED. R. CIV. P. 26(a)(1) DISCLOSURES**

COMES NOW Plaintiffs, **TYRONE HENDERSON** and **JAMES O. HINES, JR.**, by counsel, and pursuant to Fed. R. Civ. P. 26(a)(1), and make the following supplemental disclosures to Defendant. These initial disclosures are based on information reasonably available to Plaintiffs at this time. Plaintiffs reserve the right to supplement these initial disclosures (either through express supplements to these disclosures or through responses to formal discovery) when additional information becomes available.

In making these initial disclosures, Plaintiffs do not waive the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, and this action or any other action. Plaintiffs also do not waive the right to object to any request for production of any document, electronically stored information, or tangible thing on the basis of any privilege, the work product doctrine, evidentiary exclusion, relevancy, undue burden or any other proper ground.

**I. Description of additional documents in possession of the Plaintiff:**

*Bates # 001158 – 001344 – will be forwarded to Defendants' counsel under separate cover*

<b>Document Type</b>	<b>Bate Stamp #</b>
ASIS International – Preemployment Background Screening Guideline	001158 – 001217
NAPBS – Employer Education Series – Background Screening and Employer Compliance with the FCRA	001218 - 001240
NAPBS – Criminal Background Checks for Employment Purposes	001241 - 001247
NAPBS – July 16, 2008 – Mary Poquette – Powerpoint – Ethics and the Background Screener	001248 - 001278
Glossary of Legal Terminology	001279 - 001281
NAPBS – Background Screening – Past, Present and Future	001282 - 001289
NAPBS – Standardization of Common Industry Terms – February 2009	001290 - 001332
NAPBS – Verifications Best Practices: What Clients Need to Know for Successful Outsourced Verifications	001333 - 001344

**TYRONE HENDERSON and  
JAMES O. HINES, JR.,  
*For themselves and on behalf of all  
similarly situated individuals,***

/s/

Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
E-mail: lenbennett@cox.net

Dale Wood Pittman  
The Law Office of Dale W. Pittman, P.C.  
112-A W Tabb St  
Petersburg, VA 23803-3212  
(804) 861-6000 - Telephone  
(804) 861-3368 - Facsimile  
Email: dale@pittmanlawoffice.com

Susan Mary Rotkis  
Consumer Litigation Associates  
763 J Clyde Morris Boulevard  
Suite 1A  
Newport News, VA 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 - Facsimile  
Email: [srotkis@clalegal.com](mailto:srotkis@clalegal.com)

David A Searles  
Francis & Mailman PC  
Land Title Building  
100 S Broad Street 19th Floor  
Philadelphia, PA 19110  
(215) 735-8600 - Telephone  
(215) 940-8000 - Facsimile  
Email: [dsearles@consumerlawfirm.com](mailto:dsearles@consumerlawfirm.com)

James Arthur Francis  
Francis & Mailman PC  
Land Title Building  
100 S Broad Street 19th Floor  
Philadelphia, PA 19110  
(215) 735-8600 - Telephone  
(215) 940-8000 - Facsimile  
Email: [jfrancis@consumerlawfirm.com](mailto:jfrancis@consumerlawfirm.com)

Janelle Elene Mason  
Consumer Litigation Associates PC (Alex)  
1800 Diagonal Rd  
Suite 600  
Alexandria, VA 22314  
(703) 273-7770 - Telephone  
(888) 892-3512 - Facsimile  
Email: [janelle@clalegal.com](mailto:janelle@clalegal.com)

Matthew James Erausquin  
Consumer Litigation Associates PC (Alex)  
1800 Diagonal Rd  
Suite 600  
Alexandria, VA 22314  
(703) 273-6080 - Telephone  
(888) 892-3512 - Facsimile  
Email: [matt@clalegal.com](mailto:matt@clalegal.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of April 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Alan Durrum Wingfield  
Troutman Sanders, LLP  
Troutman Sanders Bldg  
1001 Haxall Point  
PO Box 1122  
Richmond, VA 23219  
E-mail: [alan.wingfield@troutmansanders.com](mailto:alan.wingfield@troutmansanders.com)

David Neal Anthony  
Troutman Sanders LLP  
Troutman Sanders Bldg  
1001 Haxall Point  
PO Box 1122  
Richmond, VA 23219  
Email: [david.anthony@troutmansanders.com](mailto:david.anthony@troutmansanders.com)

John C. Lynch  
Troutman Sanders, LLP  
P.O. Box 61185  
222 Central Park Avenue  
Suite 2000  
Virginia Beach, VA 23462  
E-mail: [john.lynch@troutmansanders.com](mailto:john.lynch@troutmansanders.com)

Timothy James St. George  
Troutman Sanders, LLP  
Troutman Sanders Bldg  
1001 Haxall Point  
PO Box 1122  
Richmond, VA 23219  
E-mail: [tim.stgeorge@troutmansanders.com](mailto:tim.stgeorge@troutmansanders.com)

/s/  
Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
E-mail: lenbennett@cox.net